

7/1/07

Bulletin No. 07-26

P-2510 C1

P-2510 New Applications (Continued)C. Interview (273.2(e))

A personal interview is required for each household applying for Food Stamp benefits, and at least once every 12 months as part of the recertification.

1) Face-to-Face Interview (273.2(e)(1))

Although federal rules require a face-to-face interview except for hardship reasons as explained below, Vermont received a waiver in January of 2007 allowing telephone interviews in place of face-to-face interviews without documenting a hardship reason in any recertification and in 50% of initial applications. We meet this limit by not allowing telephone interviews for applicants with a work requirement (ABAWDs and Reach Up applicants). Also, Reach Up child-only cases must have a face-to-face interview at initial application.

A household may appoint an authorized representative to make the application and have the interview. You may interview the head of household, spouse, any other responsible member of the household, or an authorized representative. The applicant may bring any person he or she chooses to the interview. You may hold the interview at a District ESD Office, at an outposting site, in a prison, in the applicant's home, or over the telephone. If the applicant is unable to come to the office and does not have an authorized representative, you may conduct a telephone interview.

2) Waiving the Face-to-Face Interview (273.2(e)(2))

You should waive the face-to-face (FTF) interview requirement in favor of a telephone interview in cases where:

- a hardship situation exists, and/or
- all members are elderly or disabled and have no earned income.

People who request a FTF interview must be granted one.

Do not allow a telephone interview for households that include an individual who has committed an Intentional Program Violation or fraud.

You may conduct a telephone interview instead of a FTF interview when one of the following hardship circumstances exists:

- the person is elderly or disabled,
- individual or family illness,
- severe weather,
- residency in a rural area (nearly 2/3 of Vermont),

7/1/07

Bulletin No. 07-26

P-2510 C2

P-2510 New ApplicationsC. Interview (273.2(e))2) Waiving the Face-to-Face Interview (273.2(e)2)) (Continued)

- transportation difficulties,
- conflict with work, training or school hours,
- childcare issues,
- care of a household member,
- confidentiality concerns,
- stigma from an office visit would deter household from applying for benefits, or
- other hardship situation you determine.

For cases that do not fall under the waiver, you must document the hardship reason in the case file and on CATN. For example, when a household applying for Reach Up cannot come for a face-to-face interview at initial application, you must document the hardship reason because the household has a work requirement.

Keep in mind that waiving the face-to-face interview does not:

- exempt the household from verification requirements;
- exempt the household from signature requirements;
- affect the length of the certification period.

3) Telephone Interviews under the Waiver (rule 273.2(e)(2), FNS waiver 2070010)At initial application:

You may conduct a telephone interview for any applicant who does not have a work requirement without documenting the hardship reason. You may ask if the applicant would like the interview to be by telephone instead of in person, or the applicant may request a telephone interview.

If you believe a face-to-face interview is more appropriate to resolve specific issues in person, you may schedule a face-to-face interview with the household. If the household asks for a telephone interview when you believe the in-person interview is important, ask what the hardship reason is, and document it in the CATN notes. You should not question the hardship statement.

At recertification:

You may interview any recipient by telephone, regardless of whether there is a work requirement or not.

7/1/07

Bulletin No. 07-26

P-2510 C3

P-2510 New ApplicationsC. Interview4) Working Applicants

It is important for you to keep to a minimum the amount of time a working applicant must be absent from the job to transact food stamp business.

To minimize the time a working applicant must spend to apply, you should:

- try to have the completed Application (ESD 202) in front of you before the interview;
- let the applicant make a specific appointment for an interview either in the office or over the phone (a lunch-hour appointment, either in person or over the phone is a possibility);
- see or call the applicant promptly at the appointment time.

Be sure to allow enough time to verify and document the accuracy of statements made on the application. See P-2510 D.

5) Conducting the Interview

At the interview, you must explore and resolve with the household any unclear or incomplete information and not simply review the information given on the application.

You must advise households of their rights and responsibilities during the interview, including the appropriate application processing standard and the households' responsibility to report changes.

Protect the applicant's right to privacy during the interview. Conduct the interview as an official and confidential discussion of household circumstances.

Document on the ESD 202 and on CATN that this was a phone interview.

Ask the applicant if there are any other questions before you hang up.

(a) Prepare

Using PERS/D/HIST, see if the person is known to ACCESS.

If the case record is in your district, pull the file, read it, and have it available during your interview. If the case record is in another district, request the case; ask the worker assigned the case to provide you with any pertinent information from the file.

7/1/07

Bulletin No. 07-26

P-2510 C4

P-2510 New ApplicationsC. Interview5) Conducting the Interview (Continued)a) Prepare (Continued)

If you already have the completed application, review it and list all your questions before the interview.

Have forms available before starting the interview.

Allow yourself sufficient time to conduct the interview.

For telephone interviews, if the applicant is calling long distance, obtain the phone number and call the applicant back.

For face-to-face interviews, clear your desk of papers with other peoples' names on them.

If you are conducting an interview in the applicant's home or elsewhere offsite, complete the above steps before leaving the office.

b) Explain

- Explain the basic facts of the Food Stamp Program:

- 1) Resource limit.
- 2) Income limit.
- 3) Household configuration.
- 4) Deductions.
- 5) Expenses.
- 6) Allotment.
- 7) Review of eligibility.
- 8) Cash-out part of the program, if applicable, including the requirement for direct deposit if the person has a bank account (rule 2102).
- 9) What may be purchased with food stamp benefits.
- 10) Work registration and ABAWD requirements.

7/1/07

Bulletin No. 07-26

P-2510 C5

P-2510 New ApplicationsC. Interview5) Conducting the Interview (Continued)b) Explain (Continued)

- Explain the person's rights and responsibilities:
 - 1) Right to know how eligibility was determined and what figures we used.
 - 2) Right to have a decision rendered within 30 days.
 - 3) Right to expedited service, if eligible, and waiver of verification prior to certification.
 - 4) Right to an explanation of the work registration rules.
 - 5) Right to a fair hearing if requested.
 - 6) Right to choose a head of household.
 - 7) Responsibility to provide requested information.
 - 8) Responsibility to report changes in circumstances either by phone, office visit, on a Change Report Form (ESD 200), or at recertification for those qualified for simplified reporting.
 - 9) Explain to individuals who are eligible for simplified reporting how it works.
 - 10) Responsibility to comply with quality control review (or case will be closed).
 - 11) Responsibility to comply with work registration requirements, if applicable.
- Explain how the applicant receives benefits when eligible:
 - 1) Within three days of being found eligible, the (non-cash-out) household will receive by registered mail an EBT (Electronic Benefit Transfer) card with directions for using it.
 - 2) Benefits will be posted to the EBT account on the first of each month.
 - 3) For cash-out recipients, who receive their ongoing benefit by direct deposit, it may take up to two weeks for direct deposit to begin. They receive a check for the month's benefits on the first of the month until direct deposit begins. On an ongoing basis, monthly benefits will be posted to the bank account on the first of the month.
 - 4) Explain expedited service timeframes, if applicable.

7/1/07

Bulletin No. 07-26

P-2510 C6

P-2510 New ApplicationsC. Interview5) Conducting the Interview (Continued)c. Complete Forms

Review each question with the applicant and fill in any blanks on the ESD 202 with the answers provided by the applicant. Even if the applicant has already filled out some or all of the forms, ask the questions to be sure the applicant understood them. Fill in each blank on the ESD 202, and sign your name as the person helping to complete the application.

If the application is signed, do not write in the areas where the person's responses go or change the person's responses. Document only in the blank areas under the questions.

If the application is not signed, explain that you will mail it to the applicant for signature. Tell the applicant that it is important to review, sign, and return it immediately because the date of processing begins when the signed application is received in the district office.

For a face-to-face interview, have the applicant, if able, complete the forms. If the applicant needs your help, be sure to sign the application where it asks for signature of person helping to fill out the form. Have the applicant sign an Agreement to Report Change (ESD 201A).

Always document the applicant's statements. (See Documentation and Verification.)

For a telephone interview, document the applicant's statement in the blank areas under the questions on the ESD 202.

Explain the simplified reporting rules and explain the income chart on the back of the form.

d) Verification

After obtaining answers to all the questions on the ESD 202 and completing all other required forms, if verification is needed, complete a Verification Request (ESD 202V) listing any items of verification the applicant must still provide before an eligibility determination can be made, and either give it to the applicant or tell them you will send it. Keep a copy for the case record.

7/1/07

Bulletin No. 07-26

P-2510 C7

P-2510 New ApplicationsC. Interview5) Conducting the Interview (Continued)

Ask the applicant if there are any other questions before you hang up. Give the applicant at least 12 days (10 days plus 2 additional days' mailing time) to provide the information or to notify the district office of any problems in obtaining it. If the applicant has difficulty obtaining verification, do whatever you can to help them get it.

If all the requested verification is not returned by the specific date, send the person a Verification Reminder (ESD 202V2). Give the person at least 12 days to provide the information or to notify the district office of any problems in obtaining it.

e) Reporting Changes

Remind the applicant of the responsibility to report changes. Explain that when a household is found eligible, a Change Report form (ESD 200) with a postage-paid envelope will be mailed to the household with the Notice of Decision letter (ESD 220). Have the applicant sign a ESD 201A Explain the simplified reporting rules and explain the income chart on the back of the form.

Send the Agreement to Report Change (ESD 201A) with the application for signature, as well as the ESD 202V, if necessary. In cases where a household member must apply for a Social Security number, also send a Social Security Number Referral (ESD 215A).

Whenever you receive a completed ESD 200 (Change Report Form), send another ESD 200 and postage-paid envelope to the person with the ESD 220 on the reported change.

f) Process

When you have the signed application and verifications, proceed to determine eligibility in the regular manner.

7/1/08

Bulletin No. 08-16

P-2510 C8

P-2510 New ApplicationsC. InterviewSending the Notice of Missed Interview (NOMI)

We are required to inform all Food Stamp applicants and recipients who miss a scheduled interview appointment that they missed the scheduled interview and they are responsible for rescheduling the missed interview.

Whenever you schedule a telephone or office interview for either an initial application or recertification and the individual misses the interview without rescheduling, you must send a Notice of Missed Interview (NOMI – 202D) before denying the application or closing the case.

The NOMI is available both in SPEC/C/FORMS and as a manual 202D (called Interview Reminder Notice/Notice of Missed Interview).

Be sure to indicate on the NOMI that it is for the Food Stamp Program.

You must schedule all interviews as promptly as possible to allow the individual time to participate before the end of the 30-day processing period. Since you send the NOMI after the individual has missed a scheduled appointment, you should send it no later than 24 hours after the missed interview.